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TO: Division of Shellfish Sanitation Staff

THROUGH: Eric H. Bartsch, P.E., Director
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FROM: Cloyde W. Wiley, Director
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SUBJECT: Plants - Policy - Certificate of Occupancy Permits

Some plants alternate certification between crab meat processing during the spring and summer, and shellfish processing during the fall and winter. Other plants operate simultaneously during the year as both crustacea and shellfish processors. This memo is intended to clarify problems that may arise in obtaining a Certificate of Occupancy (CO) for these two types of operations.

Alternating Certification:

Only one CO can be issued by the local building official (LBO) for a single building. Therefore, for plants that alternate certification between crustacea and shellfish processing, all problems cited by the LBO must be corrected before the CO can be issued.

Some of these plants may have blower tanks with submerged inlets. The question has arisen whether the blower cross-connection would have to be corrected prior to issuance of the CO.

If the plant owner does not want to correct the blower problem prior to certification of the crab picking operation, he may disconnect the blower to the satisfaction of the LBO (which may be as simple as disconnecting the sanitary piping). Once all the other problems are corrected to the satisfaction of the LBO and the CO is issued, the plant can be certified for the processing of crustacea.

However, in order for the plant to be certified as a shellfish operation any time after October 31, 1988, the owner must obtain a plumbing permit for the blower tank from the LBO. It will be the responsibility of the sanitarian to track any plants pursuing this policy, and to indicate on the precertification inspection that such a plumbing permit is needed. When such a plant's certification papers are sent to the central office, they shall indicate that a special plumbing permits was needed and a copy is attached.

Simultaneous Certification:

Some plants operate simultaneously during the year as crustacea and shellfish processors. Where these two operations are conducted in totally separate buildings, a CO must be issued for each building, as per standing policy.

However, for simultaneous operations conducted under one roof, or where two separate plants share a common wall (unless the common wall is a true firewall) only one CO for the entire building can be issued by the LBO. Therefore the dealer will have to correct all problems identified by the LBO in the shellfish as well as the crustacea operation in order to be certified as a crustacea operation after March 31, 1988. Thus, blower tank cross-connections would have to be corrected prior to certification of the crustacea operation.

If correction of blower tank cross-connections in such a simultaneous operation cannot be done prior to certification of the crustacea operation, then the dealer could disconnect the blower tank and request decertification of the shellfish operation, or disconnect the blower and request reclassification of the shellfish operation as only a shellstock shipper.